

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

WILLIAM ANDERSON,

Plaintiff,

v.

THE BASEBALL CLUB OF SEATTLE
d/b/a/ THE SEATTLE MARINERS; THE
CITY OF SEATTLE; JASON WEAVING;
LARRY HARVEY; LARRY MEYER;
OFFICER TIMOTHY RENIHAN; TRENT
BERGMAN; OFFICER DAVID SULLIVAN;
OFFICER JUAN ORNELAS; and JOHN
DOE NOS. 1-10,

Defendants.

NO. C09-0850 RAJ

**DECLARATION OF TED BUCK
IN SUPPORT OF CITY
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

**NOTE ON MOTION CALENDAR:
NOVEMBER 12, 2010**

TED BUCK declares under oath and on the basis of personal knowledge:

1. I am one of the attorneys representing the City of Seattle and the
defendant officers in this matter.

2. The exhibits described in and attached to this declaration are all true and
correct copies of documents generated or received and maintained by our office in the
ordinary course of its representation of The City of Seattle.

DECLARATION OF TED BUCK IN SUPPORT OF
CITY DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT - 1

C09-0850 RAJ
3019-030590 601868x

STAFFORD FREY COOPER

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601 Union Street, Suite 3100

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- 1 **Exhibit 1** Excerpts from the deposition testimony of William Anderson taken
2 July 7, 2010.
- 3 **Exhibit 2** Consumer Service Bureau Workflow report created 1/5/2005.
- 4 **Exhibit 3** Excerpts from the deposition testimony of Timothy Renihan taken
5 August 4, 2010.
- 6 **Exhibit 4** Excerpts of plaintiff's responses to City Defendant's First
7 Interrogatories and Requests for Production dated June 17, 2010.
- 8 **Exhibit 5** Plaintiff's responses to Defendant Baseball Club of Seattle's First
9 Interrogatories, Requests for Production and Requests for
10 Admission dated June 17, 2010.
- 11 **Exhibit 6** Seattle Police Department Policy and Procedure regarding off-duty
12 employment.
- 13 **Exhibit 7** Secondary Employment Permit of Timothy Renihan.
- 14 **Exhibit 8** Incident Report dated June 18, 2006.
- 15 **Exhibit 9** Incident Report dated August 26, 2006.
- 16 **Exhibit 10** Incident Report dated August 27, 2006
- 17 **Exhibit 11** Citation dated April 14, 2009
- 18 **Exhibit 12** City of Seattle Ordinance No. 119534
19 Excerpts of Agreement between City of Seattle and The Baseball
20 Club of Seattle.
- 21 **Exhibit 13** Excerpts from the deposition testimony of Trent Bergmann taken
22 July 12, 2010
- 23 **Exhibit 14** Excerpts from the deposition testimony of Lawrence Meyer taken
 July 26, 2010.
- Exhibit 15** Excerpts from the deposition testimony of Juan Ornelas taken
 September 16, 2010

1 I CERTIFY under penalty of perjury according to the laws of the State of
2 Washington and of the United States that the foregoing is true and correct.

3 DATED at Seattle, Washington, this 20th day of October, 2010.

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5 /s/ Ted Buck via ECF
6 TED BUCK
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DECLARATION OF TED BUCK IN SUPPORT OF
CITY DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT - 3

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Certificate of Service

I certify that on the date noted below I electronically filed this document entitled DECLARATION OF TED BUCK IN SUPPORT OF CITY DEFENDANTS' MOTION FOR SUMMARY JUDGMENT with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

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*Attorneys for Defendant Baseball
Club of Seattle d/b/a The Seattle Mariners*

DATED this 20th day of October, 2010, at Seattle, Washington.

/s/ Ted Buck via ECF

DECLARATION OF TED BUCK IN SUPPORT OF
CITY DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT - 4

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